

1 PAUL S. GERDING JR. #017237
ANDREW L. MCNICHOL #031557
2 KUTAK ROCK LLP
8601 North Scottsdale Road, Suite 300
3 Scottsdale, AZ 85253-2742
(480) 429-5000
4 paul.gerdingjr@kutakrock.com
andrew.mcnichol@kutakrock.com

5 *Attorneys for Defendants*

6
7
8 **UNITED STATES DISTRICT COURT**
9 **IN AND FOR THE DISTRICT OF ARIZONA**

10 Erick Ndwiga,

11 Plaintiff,

12 v.

13 Plaza Insurance Company; RTWI, Inc.; and
14 Todd Jeffrey Sime,

15 Defendants.

NO.: 2:18-cv-02324-SPL

**RTW INC.'S CORPORATE
DISCLOSURE STATEMENT**

16 This Corporate Disclosure Statement is filed on behalf of Defendant RTW,
17 Inc. (erroneously named in the complaint as RTWI, Inc.), in compliance with the
18 provisions of: (*check one*)

19 X Rule 7.1, Federal Rules of Civil Procedure, a nongovernmental corporate
20 party to an action in a district court must file a statement that identifies any parent
21 corporation and any publicly held corporation that owns 10 percent or more of its stock or
22 states that there is no such corporation.

23 _____ Rule 12.4(a)(1), Federal Rule of Criminal Procedure, any nongovernmental
24 corporate party to a proceeding in a district court must file a statement that identifies any
25 parent corporation and any publicly held corporation that owns 10 percent or more of its
26 stock or states that there is no such corporation.

_____ Rule 12.4(a)(2), Federal Rule of Criminal Procedure, if an organizational victim of alleged criminal activity is a corporation the government must file a statement identifying the victim and the statement must also disclose the information required by Rule 12.4(a)(1).

The filing party hereby declares as follows:

_____ No such corporation.

 X Party is a parent, subsidiary or other affiliate of a publicly owned corporation as listed below. (*Attach additional pages if needed.*)

Plaza Insurance Company, an Iowa corporation with its main office in Kansas City, Missouri, is a wholly owned subsidiary of Rockhill Insurance Company, an Arizona corporation with its main office in Kansas City, Missouri. Both Rockhill Insurance Company and RTW, Inc. (a Minnesota corporation with its main office in Bloomington, Minnesota) are both wholly owned subsidiaries of Rockhill Holding Company, a Delaware corporation. The Complaint erroneously identified “RTW, Inc.” as “RTWI, Inc.” Rockhill Holding Company is a wholly owned subsidiary of State Automobile Mutual Insurance Company, an Ohio corporation and part of the State Auto Insurance Group. State Automobile Mutual Insurance Company owns approximately 61% of State Auto Financial Corporation, which is publicly traded on the Nasdaq Global Select Market System under the symbol STFC. STFC is the only publicly traded company within the State Auto Insurance Group.

_____ Publicly held corporation, not a party to the case, with a financial interest in the outcome. *List identity of corporation and the nature of financial interest. (Attach additional pages if needed.)* _____ Relationship

_____ Other (Please explain)

1 **A supplemental disclosure statement will be filed upon any change in**
2 **the information provided herein.**

3 DATED this 19th day of September, 2018.

4 KUTAK ROCK LLP

5
6 By s/ *Paul S. Gerding Jr.*

7 Paul S. Gerding Jr.
8 Andrew L. McNichol
9 Suite 300
10 8601 N. Scottsdale Road
11 Scottsdale, AZ 85253

12 *Attorneys for Defendants*
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2018, I caused the foregoing RTW, Inc.'s Corporate Disclosure Statement to be electronically transmitted to the Clerk's Office using the CM/ECF System for filing and transmitted a Notice of Electronic Filing to the following CM.ECF registrants:

Michael Patrick Doyle
Patrick M. Dennis
DOYLE LLP
2633 E. Indian School Road, Suite 320
Phoenix, AZ 85016
mduoye@doylelawfirm.com
pdennis@doylelawfirm.com
Attorneys for Plaintiff

By: s/ Myra Pensyl